

1 DEANNA L. FORBUSH (6646)  
2 REX D. GARNER (9401)  
**FOX ROTHSCHILD LLP**  
3 1980 Festival Plaza Drive, #700  
4 Las Vegas, Nevada 89135  
(702) 262-6899 tel  
(702) 597-5503 fax  
5 dforbush@foxrothschild.com  
rgarner@foxrothschild.com  
6 *Attorneys for Defendants Western Best, LLC  
and Western Best, Inc. dba Chicken Ranch*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

9 ANGELA WILLIAMS; JANE DOE #1;  
10 JANE DOE #2,

Case No. 2:21-cv-01676-APG-VCF

11 || Plaintiffs,  
v.

**DEFENDANTS WESTERN BEST, INC.  
D/B/A CHICKEN RANCH AND  
WESTERN BEST LLC'S NOTICE OF  
NON-OPPOSITION TO PROPOSED  
INTERVENOR RUSSELL GREER'S  
MOTION FOR RECONSIDERATION  
TO INTERVENE [ECF No. 182]**

12 STEVE SISOLAK, Governor of Nevada, in  
13 his official capacity; AARON FORD,  
14 Attorney General of Nevada, in his official  
15 capacity; THE CITY OF LAS VEGAS;  
16 CLARK COUNTY; NYE COUNTY;  
17 WESTERN BEST, INC. D/B/A CHICKEN  
18 RANCH; WESTERN BEST LLC; JAMAL  
19 RASHID; MALLY MALL MUSIC, LLC;  
20 FUTURE MUSIC, LLC; PF SOCIAL MEDIA  
21 MANAGEMENT, LLC; E.P. SANCTUARY;  
22 BLU MAGIC MUSIC, LLC; EXCLUSIVE  
BEAUTY LOUNGE, LLC; FIRST  
INVESTMENT PROPERTY LLC; V.I.P.  
ENTERTAINMENT, LLC; MP3  
PRODUCTIONS, INC.; MMM  
PRODUCTIONS, INC.; SHAC, LLC D/B/A  
SAPPHIRE GENTLEMAN'S CLUB  
AND/OR SAPPHIRE; SHAC MT, LLC; and  
LAS VEGAS BISTRO, LLC D/B/A LARRY  
FLYNT'S HUSTLER CLUB,

## Defendants.

24  
25  
26  
27  
28

1 Defendants Western Best, LLC and Western Best, Inc. dba Chicken Ranch, by and through  
2 their counsel of record, the law firm Fox Rothschild LLP, hereby submit their Notice of Non-  
3 opposition to Proposed Intervenor Russell Greer's Motion for Reconsideration to Intervene as  
4 Defendant Per FRCP 60(b)(1) (ECF No. 182), filed on October 17, 2022.  
5

6 DATED this 21st day of October, 2022.  
7

8 **FOX ROTHSCHILD LLP**

9 */s/ Deanna L. Forbush* \_\_\_\_\_  
10 DEANNA L. FORBUSH  
11 REX D. GARNER  
12 1980 Festival Plaza Drive, Suite 700  
Las Vegas, NV 89135  
13 *Attorneys for Defendants Western Best, LLC*  
14 *and Western Best, Inc. dba Chicken Ranch*

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I certify that I am an employee of Fox Rothschild LLP, over the age of 21 years and not a party to nor interested in the within action. I certify that on this 21<sup>st</sup> day of October 2022, I caused the foregoing document entitled **DEFENDANTS WESTERN BEST, INC. D/B/A CHICKEN RANCH AND WESTERN BEST LLC'S NOTICE OF NON-OPOSITION TO PROPOSED INTERVENOR RUSSELL GREER'S MOTION FOR RECONSIDERATION TO INTERVENE AS A DEFENDANT PER FRCP 60(b)(1)** to be electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Gregory Louis Zunino  
Nevada State Attorney General's Office  
100 N. Carson Street  
Carson City, NV 89701  
[GZunino@ag.nv.gov](mailto:GZunino@ag.nv.gov)  
[sgeyer@ag.nv.gov](mailto:sgeyer@ag.nv.gov)  
*Attorneys for Governor Sisolak  
And Attorney General of Nevada Ford*

Joel K. Browning  
Clark County District Attorney Civil Division  
500 S. Grand Central Pkwy., #5075  
Las Vegas, NV 89155  
[Joel.browning@clarkcountyda.com](mailto:Joel.browning@clarkcountyda.com)  
*Attorneys for Clark County*

Jeffrey L. Galliher  
Las Vegas City Attorney's Office  
495 S. Main Street, 6<sup>th</sup> Floor  
Las Vegas, NV 89101  
[jgalliher@lasvegasnevada.gov](mailto:jgalliher@lasvegasnevada.gov)  
*Attorneys for the City of Las Vegas*

Brent L. Ryman Erickson  
Thorpe & Swainston, Ltd.  
99 W. Arroyo  
PO Box 3559  
Reno, NV 89505  
[bryman@etsreno.com](mailto:bryman@etsreno.com)  
*Attorneys for Nye County*

/s/ Jineen DeAngelis  
An Employee of Fox Rothschild LLP